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Jan. 3, 2001

Beaver Air Taxi, LLC  
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FAA-01-8743-1

Federal Aviation Administration  
Attn: Rules Docket. AGC-10  
Office of the Chief Counsel  
800 Independence Avenue, SW  
Washington, D.C. 20591

RE: Exemption from 135.143(C)(2) of the FAR

Dear Sir(s);

In accordance with 14 CFR 11.25, Beaver Air Taxi LLC hereby petitions the Federal Aviation Administration for an exemption from 14CFR 135.143(c)(2). Part 135.143 (c)(2) requires after January, 1992 any transponder not meeting the requirements of TSO-C112 (mode S) may not be installed on any aircraft operation under the provisions of FAR 135. The proposed exemption would apply to one aircraft: Cessna 172E /Reg. Nbr. N5312T.

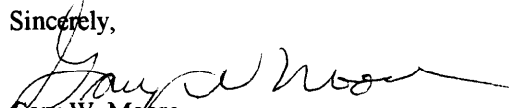
Alaska does not have Mode S capability since FAA facilities here lack Mode S ground sensors, thus making the mode S system unusable. In addition, we feel that the high cost of Mode S equipment as opposed to Mode A/C equipment would present an unnecessary economic hardship to our operation.

We also feel that it is in the interest of public safety and that an equivalent level of safety could be accomplished with the installation of a Mode A/C transponder. TCAS equipment installed on most modern airliners interrogate Mode A/C transponders providing a heightened level of proximity warning.

Beaver Air Taxi is primarily a flightseeing/tour operation located at Lake Hood Seaplane Base in Anchorage, Alaska. On an average summer day we make as many as eight flight tours of the local Anchorage area in which we are exposed to one of the highest concentration of mixed (commercial, military and general) air traffic anywhere. Last flying season we experienced two very close near misses over a high density reporting point within the Anchorage Terminal Control Area. Our Air Traffic Controllers are among the best and deserve all the advantages we can give them to promote safe flight operations by being able to identify an individual aircraft's location.

We further request that this petition not be held up by publishing in the Federal Register. The delay of this petition for publishing in the Federal Register could potentially have a significant compromise to our operations safety.

Sincerely,

  
Gary W. Moore  
Beaver Air Taxi, LLC